

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

DEFENDANTS LISTED ON EXHIBIT A,

Defendants.

ORDER AUTHORIZING THE DEPOSITION OF BERNARD L. MADOFF

On July 7, 2016, certain defendants represented by Chaitman LLP (the “Chaitman Defendants”) filed a Motion for Leave to Depose Bernard L. Madoff (“Madoff”) pursuant to Fed. R. Civ. P. 30(a)(2)(B) on certain enumerated areas (the “Chaitman Motion”). (ECF No. 13603). On July 20, 2016, the Court established a procedure whereby additional defendants could join the Chaitman Motion and also seek leave to depose Madoff, which procedure was memorialized by the Trustee on July 22, 2016 with his filing of a Notice to Defendants Establishing Deadline to File Requests to Depose Bernard L. Madoff. (ECF No. 13786).

Additional defendants (collectively, with the Chaitman Defendants, the “Participating Customers”), filed notices seeking to participate in a deposition of Madoff (ECF Nos. 13825, 13838, 13839, 13840, 13841, 13844) (the “Notices”) on or before August 5, 2016, and responses were filed on August 19, 2016 by (a) the Trustee (ECF No. 13902); and (b) Capital Growth Company; Decisions, Inc.; Favorite Funds; JA Primary Limited Partnership; JA Special Limited Partnership; JAB Partnership; JEMW Partnership; JF Partnership; JFM Investment Companies; JLN Partnership; JMP Limited Partnership; Jeffrey M. Picower Special Company; Jeffrey M. Picower, P.C.; The Picower Foundation; The Picower Institute of Medical Research; The Trust f/b/o Gabrielle H. Picower; and Barbara Picower, individually, as Executor of the Estate of Jeffrey M. Picower, and as Trustee for the Picower Foundation and for the Trust f/b/o Gabrielle H. Picower (collectively, the “Picower Parties”) (ECF No. 13903) (the “Responses”). The Chaitman Defendants filed a reply on August 22, 2016. (ECF No. 13912).

The Court, having reviewed all papers filed and submitted in connection with the Chaitman Motion, the Notices and the Responses, and having held a hearing on August 24, 2016, and the Court having issued a bench ruling at the August 24, 2016 hearing approving the Participating Customers’ requests to depose Madoff to the extent set forth during the hearing, and instructing Chaitman LLP to submit a proposed order;

IT IS HEREBY ORDERED THAT:

Madoff’s deposition is authorized subject to the terms and limitations of this Order. On the first day of Madoff’s deposition, the Participating Customers are authorized to inquire solely regarding the following topics (collectively, the “Day 1 Deposition Topics”):

1. The trading activities of Madoff’s market making and proprietary trading units during

the period prior to January 1, 1992 and thereafter.

2. The trading activities for Madoff's investment advisory customers prior to January 1, 1992 and thereafter.
3. The number of employees, profitability, and revenue-generating activities of each Madoff unit in the period prior to January 1, 1992 and thereafter.
4. The nature, extent and scope of Madoff's legitimate and illegitimate activities at various time periods, including, *inter alia*, when Madoff began operating a "Ponzi" scheme and how it came about that he began operating a "Ponzi" scheme.
5. The extent to which different trading strategies were involved with legitimate or illegitimate activities.
6. The record-keeping procedures of each unit of Madoff's operations, including but not limited to records indicating the purported purchase and sale of securities and the purported allocation of securities to investment advisory customers.
7. The interpretation of Madoff's or BLMIS' account records, including but not limited to monthly account statements.

The following limitations and procedures are imposed on Madoff's deposition:

A. Except for any counsel that may appear on Madoff's behalf, only two attorneys for the Trustee may appear at the deposition; only two attorneys for the Participating Customers may appear (collectively "Authorized Counsel"); no other appearances are authorized.

B. Helen Davis Chaitman of Chaitman LLP is appointed lead counsel for the Participating Customers.

C. The Day 1 deposition will take place on one day for a maximum of seven (7)

hours on a date and time as soon as practicable, but subject to the discretion of the warden of the Federal Correctional Institution located in Butner, North Carolina. Counsel for the Trustee, the Participating Customers, the Picower Parties and the Securities Investor Protection Corporation (“SIPC”), and their retained experts, if any, shall receive and have an opportunity to review the transcript for a 21-day period. No other counsel or clients shall have access to the transcript during this time. Within twenty one (21) calendar days following receipt of the transcript, counsel for the Trustee and/or the Participating Customers may file with the Court a request for a second deposition day, specifically identifying any proposed deposition topics (the “Day 2 Deposition Topics”).

D. Any objections or responses to the Day 2 Deposition Topics may be filed no more than seven calendar (7) days thereafter by counsel for the Trustee, the Participating Customers, the Picower Parties and SIPC. The Court will subsequently schedule a hearing, if needed, to determine authorized counsel for a second day of the deposition and the Day 2 Deposition Topics.

E. In advance of the deposition, Chaitman LLP will provide a copy of this Order to Madoff.

F. Authorized Counsel are prohibited, at any point during Madoff’s deposition, from asking Madoff any questions beyond the scope of the Court-approved Day 1 and Day 2 Deposition Topics, including any questions about (i) the Profit Withdrawal Litigation as it relates to the accounts of Aaron Blecker and any other claimants who are taking part in the Profit Withdrawal Litigation, a list of whom is attached as Exhibit B, however, nothing in this Order bars defense counsel from asking Madoff questions concerning the alleged profit

withdrawals received by their clients who are defendants in pending actions, or (ii) Jeffry M. Picower, the Picower Parties or their agents, or the Picower Parties BLMIS accounts (other than as set forth in the transcript of hearing dated August 24, 2016 in this matter). To the extent Madoff testifies regarding Jeffry Picower, the Picower Parties, or their BLMIS accounts in responding to questions on any of the Day 1 or Day 2 Deposition Topics, Authorized Counsel may follow up with questions concerning Picower and/or the Picower Parties only to the extent that such follow up questions directly relate to the Day 1 or Day 2 Deposition Topics. However, Authorized Counsel may not use any testimony by Madoff regarding Picower to deviate from the Day 1 or Day 2 Deposition Topics, including but not limited to by inquiring about Picower's conduct that is not directly related to the Day 1 or Day 2 Deposition Topics.

G. Absent further order of the Court, the deposition testimony of Madoff and the transcript(s) (collectively, the "Transcripts") thereof shall not be used by any person or entity for any reason as it relates to the Picower Parties, including but not limited to in any pending or future litigation that may be brought against the estate of Jeffry M. Picower, the Picower Parties or their agents, or any related person or entity.

H. The Transcripts for each day of Madoff's deposition shall remain confidential and under seal for the longer of sixty (60) days after the date any of the Transcripts are provided to counsel to the Trustee, the Participating Customers, the Picower Parties and SIPC, or, if any party seeks to seal, strike or redact any portion of the Transcripts, then solely as to that portion of the Transcript, the day after a final, non-appealable order is entered on such motion(s) (the "Confidentiality Period"). Each of the Transcripts shall automatically be re-designated as not confidential when the Confidentiality Period for each of the Transcripts expires, subject to any

sealing, striking or redactions that the Court may have ordered.

I. During the Confidentiality Period, the Transcripts and contents of Madoff's deposition may not be disclosed, except to counsel and counsel's retained experts, if any, for the Trustee, the Participating Customers, the Picower Parties and SIPC, all of whom, including the experts, shall maintain the confidentiality of the Transcripts and their contents, and all of whom may file with the Court, under seal, requests to strike and/or redact any questions or answers in the Transcripts concerning (i) any topics other than the approved Day 1 Deposition Topics or the Day 2 Deposition Topics, as the case may be, (ii) profit withdrawal issues, as limited by Paragraph F, above, (iii) Jeffrey M. Picower, the Picower Parties or their agents or related parties, or any BLMIS accounts held by or on behalf of any of the Picower Parties.

J. Any requests or motions to strike and/or redact any part of Madoff's deposition Transcripts, and any responses thereto, shall be filed under seal pursuant to Section III.C of this Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means promulgated under Local Rule 5005-2, shall be served on counsel for the Trustee, the Participating Customers, the Picower Parties and SIPC at the time of filing under seal, and shall remain confidential during the Confidentiality Period.

K. In the event that counsel for the Trustee, the Participating Customers, the Picower Parties or SIPC receives any request, subpoena or other process seeking disclosure of Madoff's deposition Transcripts or information related to Madoff's testimony during the Confidentiality Period, such counsel, within three business days thereof, shall notify the Court and counsel for the Trustee, the Participating Customers, the Picower Parties and SIPC of the subpoena or other request, and shall await direction from the Court before responding to such request, subpoena or

other process.

L. The Participating Customers whose fact discovery closed under the case management order prior to July 7, 2016 (identified on Exhibit C attached hereto) are not permitted to participate in Madoff's deposition(s). As to the Participating Customers whose fact discovery is set to close on or after July 7, 2016, the Court extends fact discovery for the limited and sole purpose of taking Madoff's deposition. Other than for that purpose, the deadlines in the applicable case management orders remain unchanged. Notwithstanding the dates set forth in the case management orders, counsel for the Trustee, the Participating Customers, the Picower Parties and SIPC have the right to move the Court for further discovery based upon Madoff's testimony.

M. The Court, in its discretion, may impose sanctions on any person or entity that violates any provision of this Order.

N. This Court shall retain exclusive jurisdiction over the enforcement, implementation, and interpretation of this Order.

New York, New York
Dated: September 29, 2016

/s/ STUART M. BERNSTEIN
Hon. Stuart M. Bernstein
United States Bankruptcy Judge

Exhibit A
Pg 8 of 15**Requests to Depose Bernard L. Madoff**

No.	Adv. Pro. No.	Defendants	Counsel
1	10-04292	Robert Roman	Chaitman LLP
2	10-04302	Joan Roman	Chaitman LLP
3	10-04306	Angela Tiletnick	Chaitman LLP
4	10-04321	Herbert Barbanel, et al.	Chaitman LLP
5	10-04327	Gertrude E. Alpern Revocable Trust, et al.	Chaitman LLP
6	10-04335	Aspen Fine Arts Co., et al.	Milberg LLP/Seeger Weiss LLP
7	10-04336	The Estate (Succession) of Doris Igoine, et al.	Kelley Drye & Warren LLP
8	10-04344	Alexander Sirotkin	Chaitman LLP
9	10-04362	Sage Associates, et al.	McDermott Will & Emery LLP
10	10-04367	Benjamin T. Heller	Chaitman LLP
11	10-04397	Fern C. Palmer, individually and in her capacity as trustee for the Fern C. Palmer Revocable Trust dtd 12/31/91, as amended, et al.	Chaitman LLP
12	10-04400	Sage Realty, et al.	McDermott Will & Emery LLP
13	10-04415	Barbara J. Berdon	Dentons US LLP
14	10-04438	Estate of Seymour Epstein, et al.	Chaitman LLP
15	10-04446	Trust Under Agreement Dated 12/6/99 for the benefit of Walter and Eugenie Kissinger, et al.	Chaitman LLP
16	10-04469	Carol L. Kamenstein, et al.	Chaitman LLP
17	10-04474	Roger Rechler Revocable Trust, et al.	Chaitman LLP
18	10-04486	The Norma Shapiro Revocable Declaration of Trust Under Agreement Dated 9/16/08, et al.	Dentons US LLP
19	10-04487	Estate of Audrey Weintraub, et al.	Chaitman LLP
20	10-04503	Judd Robbins	Chaitman LLP
21	10-04541	Kenneth W Perlman, et al.	Chaitman LLP
22	10-04545	Jerome Goodman, et al.	Chaitman LLP
23	10-04570	Jacob M. Dick Rev Living Trust DTD 4/6/01, et al.	Chaitman LLP
24	10-04576	Norton A. Eisenberg	Milberg LLP/Seeger Weiss LLP
25	10-04582	Gerald Blumenthal	Milberg LLP/Seeger Weiss LLP
26	10-04599	The Estate of Alvin E. Shulman	Chaitman LLP
27	10-04606	Estate of Florence W. Shulman, et al.	Chaitman LLP
28	10-04614	Robert S. Whitman	Chaitman LLP
29	10-04655	Jaffe Family Investment Partnership, et al.	Chaitman LLP
30	10-04668	Timothy Shawn Teufel and Valerie Ann Teufel Family Trust U/T/D 5/24/95, et al.	Chaitman LLP
31	10-04702	S&L Partnership, a New York partnership, et al.	Dentons US LLP
32	10-04718	The Jordan H. Kart Revocable Trust, et al.	Chaitman LLP
33	10-04728	Bruno L. Digiulian	Chaitman LLP
34	10-04748	Mark Horowitz	Chaitman LLP
35	10-04749	Philip F. Palmedo	Chaitman LLP
36	10-04752	Kuntzman Family LLC, et al.	Chaitman LLP
37	10-04762	Estate of James M. Goodman, et al.	Chaitman LLP
38	10-04798	Janet Jaffe Trust UA dtd 4/20/90, et al.	Chaitman LLP
39	10-04803	The Estelle Harwood Family Limited Partnership, et al.	Chaitman LLP
40	10-04806	Kenneth M. Kohl, et al.	Chaitman LLP
41	10-04809	Edyne Gordon, et al.	Chaitman LLP
42	10-04818	Toby Harwood	Chaitman LLP
43	10-04823	Frank DiFazio, et al.	Chaitman LLP
44	10-04826	Estate of Boyer Palmer, et al.	Chaitman LLP
45	10-04852	Alvin E. Shulman Pourover Trust, et al.	Chaitman LLP
46	10-04859	Bert Margolies Trust, et al.	Chaitman LLP

Exhibit A
Pg 9 of 15**Requests to Depose Bernard L. Madoff**

No.	Adv. Pro. No.	Defendants	Counsel
47	10-04861	Harold J. Hein	Dentons US LLP
48	10-04878	Lisa Beth Nissenbaum Trust, et al.	Chaitman LLP
49	10-04882	Laura E. Guggenheimer Cole	Dentons US LLP
50	10-04912	Harry Smith Revocable Living Trust, et al.	Chaitman LLP
51	10-04920	Glenhaven Limited, et al.	Chaitman LLP
52	10-04931	Estate of Muriel B. Cantor, et al.	Chaitman LLP
53	10-04946	Stephen R. Goldenberg	Milberg LLP/Seeger Weiss LLP
54	10-04951	Harold A. Thau	Milberg LLP/Seeger Weiss LLP
55	10-04956	Denis M. Castelli	Chaitman LLP
56	10-04961	Sylvan Associates LLC f/k/a Sylvan Associates Limited Partnership, et al.	Chaitman LLP
57	10-04966	Onesco International, LTD., et al.	Milberg LLP/Seeger Weiss LLP
58	10-04978	Estate of Ira S. Rosenberg, et al.	Milberg LLP/Seeger Weiss LLP
59	10-04979	James M. New Trust dtd 3/19/01, et al.	Chaitman LLP
60	10-04991	Guiducci Family Limited Partnership, et al.	Chaitman LLP
61	10-04995	Trust u/art Fourth o/w/o Israel Wilenitz, et al.	Chaitman LLP
62	10-05026	Walter Freshman Trust A, a Florida trust, et al.	Chaitman LLP
63	10-05037	Barbara L. Savin	Chaitman LLP
64	10-05069	Potamkin Family Foundation Inc.	Milberg LLP/Seeger Weiss LLP
65	10-05079	Estate of James M. Goodman, et al.	Chaitman LLP
66	10-05104	The Gloria Albert Sandler and Maurice Sandler Revocable Living Trust, et al.	Chaitman LLP
67	10-05124	The Lawrence J. Ryan and Theresa R. Ryan Revocable Living Trust, et al.	Chaitman LLP
68	10-05128	JABA Associates LP, et al.	Chaitman LLP
69	10-05130	Barbara Kotlikoff Harman	Chaitman LLP
70	10-05133	Fern C. Palmer, et al.	Chaitman LLP
71	10-05135	Reckson Generation, et al.	Chaitman LLP
72	10-05151	Palmer Family Trust, et al.	Chaitman LLP
73	10-05157	The Harnick Brothers Partnership, et al.	Chaitman LLP
74	10-05184	Laura Ann Smith Revocable Living Trust, et al.	Chaitman LLP
75	10-05196	Irene Whitman 1990 Trust U/A DTD 4/13/90, et al.	Chaitman LLP
76	10-05209	Lapin Children LLC	Dentons US LLP
77	10-05236	Toby T. Hobish, et al.	Dentons US LLP
78	10-05257	Edward A. Zraick, Jr., et al.	Hunton & Williams LLP
79	10-05309	William Pressman, Inc., et al.	Chaitman LLP
80	10-05312	Doron Tavlin Trust U/A 2/4/91, et al.	Chaitman LLP
81	10-05377	Richard G. Eaton	Chaitman LLP
82	10-05420	Gunther K. Unflat	Chaitman LLP
83	10-05435	Keith Schaffer, et al.	Chaitman LLP

Exhibit B

Listing of Claimants Participating in the PW Litigation

<i>One Direct Account</i>	
BLMIS Account No.	BLMIS Account Name
1B0022	AARON BLECKER

<i>51 Indirect Accounts</i>		<i>81 Related Direct Accounts</i>	
BLMIS Account No.	BLMIS Account Name	BLMIS Account No.	BLMIS Account Name
1A0083	ACCU PLAN EMPLOYEES' PROFIT SHARING TRUST	1A0004	ACCU PLAN EMPLOYEES' PROFIT SHARING TRUST C/O NEIL FRIEDMAN
1B0156	AARON BLECKER REV TRUST U/A/D 3/15/07	100124	AVELLINO & ALPERN
		1B0022	AARON BLECKER
1B0157	ARTHUR BLECKER & SOFIE BLECKER J/T WROS	1B0023	ARTHUR BLECKER & SOFIE BLECKER J/T WROS
		100124	AVELLINO & ALPERN
1B0190	NTC & CO. FBO NORMAN J BLUM (xx1188)	1B0023	ARTHUR BLECKER & SOFIE BLECKER J/T WROS
1B0201	NORMAN J BLUM LIVING TRUST	1B0034	NORMAN J BLUM
		1B0033	NORMAN BLUM JOEL BLUM SUCCESSOR CO-TRUSTEES
		1B0034	NORMAN J BLUM
		1B0036	THE ESTATE OF ROSLYN BLUM APT 207 WEST
1B0251	JOEL A BLUM KERRY E BLUM JT WROS	1B0115	ROSLYN BLUM REMAINDER TRUST U/A/D 12/29/92 APT 207 WEST
		1B0033	NORMAN BLUM JOEL BLUM SUCCESSOR CO-TRUSTEES
		1B0036	THE ESTATE OF ROSLYN BLUM APT 207 WEST
1C1229	CHALEK ASSOCIATES LLC C/O MORTON CHALEK	1B0115	ROSLYN BLUM REMAINDER TRUST U/A/D 12/29/92 APT 207 WEST
		100324	SOL CHALEK
		1C1041	CHALEK EQUITIES INC
		1C1042	CHALEK INVESTMENT PARTNERSHIP ATTN: MITCHEL CHALEK
		1C1043	ALVERN CHALEK TRUST U/A/D 6/29/89
		1C1044	MORTON CHALEK
1CM504	MARGERY D KATZ	1S0170	SCHUPAK INVESTMENT C/O HOWARD M SCHUPAK, GEN PART
1CM682	BETH FELDMAN	1C0007	BERNARD L MADOFF C & M TRADING #7
1CM806	EVELYN BEREZIN WILENITZ	1C0007	BERNARD L MADOFF C & M TRADING #7
		1C0000	BERNARD L MADOFF C & M INTERIM MONEY MKT FUND
1CM837	TRUST U/ART FOURTH O/W/O ISRAEL WILENITZ EVELYN BEREZIN	1C0007	BERNARD L MADOFF C & M TRADING #7
		1C0000	BERNARD L MADOFF C & M INTERIM MONEY MKT FUND
1CM849	EUGENE B DIAMOND GST EXPT RESD TST FBO MARGERY & ERICA KATZ MARGERY DIAMOND KATZ TRUSTEE	1C0007	BERNARD L MADOFF C & M TRADING #7
		1C0007	BERNARD L MADOFF C & M TRADING #7
1F0092	FRIEDA FRESHMAN TRUSTEE WALTER FRESHMAN TRUST "A" 12/31/92	1F0044	WALTER FRESHMAN

Listing of Claimants Participating in the PW Litigation

<i>51 Indirect Accounts</i>		<i>81 Related Direct Accounts</i>	
BLMIS Account No.	BLMIS Account Name	BLMIS Account No.	BLMIS Account Name
1F0093	FRIEDA FRESHMAN TRUSTEE FRIEDA FRESHMAN REV TRUST 12/31/92	1F0044	WALTER FRESHMAN
		1F0070	FRIEDA FRESHMAN
1F0106	HOWARD L FRUCHT AND CAROLYN FRUCHT REV TRUST	1F0058	CAROLYN FRUCHT
		1F0059	HOWARD L FRUCHT M D
1F0116	CAROL FISHER	1F0017	LEO FISHER AND DOROTHY FISHER J/T WROS 260 TUSCANY E
		1H0040	DORIS HOROWITZ AS TRUSTEE U/A/D 10/4/89
1F0123	ADELE FOX TRUSTEE UDT 3/5/90 F/B/O ADELE FOX	1F0032	ADELE FOX AND RONNI FOX HARRELL J/T WROS
		1F0033	ADELE FOX TRUSTEE U D T 3/5/90 F B O ADELE
1H0099	BARBARA KOTLIKOFF HARMAN RIVERMERE ALGER COURT APT 4B	1H0008	BARBARA KOTLIKOFF HARMAN RIVERMERE ALGER COURT APT4B
		1H0009	MR HARRY J HARMAN
		1H0010	TOBY HARMAN
1H0161	THE HARNICK BROTHERS PARTNERSHIP C/O GARY HARNICK	1B0066	SYLVIA H BRODSKY
1K0118	DAVID SHAPIRO NOMINEE 4	1K0011	DAVID SHAPIRO NOMINEE 4
		1S0064	DAVID SHAPIRO
		1S0065	DAVID SHAPIRO NOMINEE
1K0206	SAULIUS KAJOTA	1R0027	NICOLE RICHARDSON
1L0146	CAREN LOW	1L0045	CAREN LOW
		1L0046	GARY LOW
1L0147	FRIEDA LOW	1L0047	ROBERT K LOW
		1L0069	FRIEDA LOW
1L0149	ROBERT K LOW	1L0047	ROBERT K LOW
1M0101	RONA MAST	100124	AVELLINO & ALPERN
		1C1092	CLAIRE COVNER REVOCABLE LIVING TRUST
		1M0027	RONA MAST & JEFF MAST J/T WROS
1M0105	EDWIN MICHALOVE	100813	IRWIN K HOROWITZ
		1G0036	MURRAY GOLD AS TRUSTEE U/A/D 08/08/90
		1H0040	DORIS HOROWITZ AS TRUSTEE U/A/D 10/4/89
		1M0037	EDWIN MICHALOVE
1P0099	NTC & CO. FBO DORIS M PEARLMAN (116443)	1E0000	BERNARD L MADOFF E & M INTERIM ACCOUNT C/O MENDEL ENGLER
1P0105	LAUREL PAYMER	1J0006	JG KNITS INC C/O M WEINGARTEN
		1W0064	TRUST U/W/O MARCUS WEINGARTEN F/B/O FELICE WEINGARTEN C/O ROBERT DAVID
1R0123	BARBARA ROTH & MARK ROTH J/T WROS	1R0043	BARBARA ROTH & MARK ROTH J/T WROS
		1R0044	BARBARA ROTH & MARK ROTH J/T WROS

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<i>51 Indirect Accounts</i>		<i>81 Related Direct Accounts</i>	
BLMIS Account No.	BLMIS Account Name	BLMIS Account No.	BLMIS Account Name
1R0133	THERESA R RYAN LAWRENCE J RYAN TRUSTEES U/D/T 11/20/91	100124	AVELLINO & ALPERN
		101846	EDWARD L RYAN CUST LAURENCE J RYAN IN TST UNDER CALIF GIFT TO MINORS ACT
		101847	DANIEL L RYAN CUST LAURENCE J RYAN IN TST UNDER CALIF GIFT TO MINORS ACT
		101908	GEORGE SCHEER AND CHARLOTTE SCHEER SPECIAL C/O ZRAICK & NAHAS
		1A0045	AVELLINO & BIENES C/O FRANK AVELLINO
		1H0023	FREDERICK P HELLER
		1R0072	LAWRENCE J RYAN & THERESA R RYAN TRUSTEES U/D/T 11/20/91
		1R0073	THERESA R RYAN LAWRENCE J RYAN TRUSTEES U/D/T 11/20/91
		1R0083	DANIEL RYAN
		H01909	GEORGE SCHEER AND CHARLOTTE SCHEER SPECIAL 2 C/O ZRAICK & NAHAS
1R0134	DANIEL RYAN	100124	AVELLINO & ALPERN
		101846	EDWARD L RYAN CUST LAURENCE J RYAN IN TST UNDER CALIF GIFT TO MINORS ACT
		101847	DANIEL L RYAN CUST LAURENCE J RYAN IN TST UNDER CALIF GIFT TO MINORS ACT
		101908	GEORGE SCHEER AND CHARLOTTE SCHEER SPECIAL C/O ZRAICK & NAHAS
		1A0045	AVELLINO & BIENES C/O FRANK AVELLINO
		1H0023	FREDERICK P HELLER
		1R0072	LAWRENCE J RYAN & THERESA R RYAN TRUSTEES U/D/T 11/20/91
		1R0073	THERESA R RYAN LAWRENCE J RYAN TRUSTEES U/D/T 11/20/91
		1R0083	DANIEL RYAN
		H01909	GEORGE SCHEER AND CHARLOTTE SCHEER SPECIAL 2 C/O ZRAICK & NAHAS
1R0171	LAWRENCE J.RYAN BY-PASS TRUST UNDER DECLARATION OF TST DTD NOV 20,1991 THERESA R. RYAN	100124	AVELLINO & ALPERN
		101846	EDWARD L RYAN CUST LAURENCE J RYAN IN TST UNDER CALIF GIFT TO MINORS ACT
		101847	DANIEL L RYAN CUST LAURENCE J RYAN IN TST UNDER CALIF GIFT TO MINORS ACT
		101908	GEORGE SCHEER AND CHARLOTTE SCHEER SPECIAL C/O ZRAICK & NAHAS
		1A0045	AVELLINO & BIENES C/O FRANK AVELLINO
		1H0023	FREDERICK P HELLER
		1R0072	LAWRENCE J RYAN & THERESA R RYAN TRUSTEES U/D/T 11/20/91
		1R0073	THERESA R RYAN LAWRENCE J RYAN TRUSTEES U/D/T 11/20/91
		1R0083	DANIEL RYAN
		H01909	GEORGE SCHEER AND CHARLOTTE SCHEER SPECIAL 2 C/O ZRAICK & NAHAS

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<i>51 Indirect Accounts</i>		<i>81 Related Direct Accounts</i>	
BLMIS Account No.	BLMIS Account Name	BLMIS Account No.	BLMIS Account Name
IS0260	SCHUPAK INVESTMENT C/O HOWARD M SCHUPAK, GEN PART	100324	SOL CHALEK
		1C1041	CHALEK EQUITIES INC
		1C1042	CHALEK INVESTMENT PARTNERSHIP ATTN: MITCHEL CHALEK
		1C1043	ALVERN CHALEK TRUST U/A/D 6/29/89
		1C1044	MORTON CHALEK
		1S0170	SCHUPAK INVESTMENT C/O HOWARD M SCHUPAK, GEN PART
IS0267	MAURICE SANDLER MD & GLORIA SANDLER REV LIV TRUST	1A0011	HENRIETTA ALBERT TRUST C/O GLORIA
		1S0021	MAURICE SANDLER MD & GLORIA SANDLER REV LIV TRUST
IS0268	SANDY SANDLER	1S0024	S ALAN SANDLER SANDY M SANDLER AND LORI B SANDLER
IS0295	ADELE SHAPIRO	101936	ESTATE OF MICHAEL SHAPIRO
		1S0063	ADELE SHAPIRO
		1S0064	DAVID SHAPIRO
		1S0065	DAVID SHAPIRO NOMINEE
		1S0066	DAVID SHAPIRO NOMINEE #2
		1S0067	DAVID SHAPIRO NOMINEE NOMINEE #3
		1S0073	SUSAN & MICHAEL SHAPIRO MEMORIAL FOUNDATION
IS0296	DAVID SHAPIRO	101936	ESTATE OF MICHAEL SHAPIRO
		1K0011	DAVID SHAPIRO NOMINEE 4
		1S0064	DAVID SHAPIRO
		1S0065	DAVID SHAPIRO NOMINEE
		1S0066	DAVID SHAPIRO NOMINEE #2
		1S0067	DAVID SHAPIRO NOMINEE NOMINEE #3
		1S0073	SUSAN & MICHAEL SHAPIRO MEMORIAL FOUNDATION
IS0297	DAVID SHAPIRO NOMINEE	101936	ESTATE OF MICHAEL SHAPIRO
		1S0063	ADELE SHAPIRO
		1S0064	DAVID SHAPIRO
		1S0065	DAVID SHAPIRO NOMINEE
		1S0066	DAVID SHAPIRO NOMINEE #2
		1S0067	DAVID SHAPIRO NOMINEE NOMINEE #3
		1S0073	SUSAN & MICHAEL SHAPIRO MEMORIAL FOUNDATION
IS0298	DAVID SHAPIRO NOMINEE #2	101936	ESTATE OF MICHAEL SHAPIRO
		1S0063	ADELE SHAPIRO
		1S0064	DAVID SHAPIRO
		1S0065	DAVID SHAPIRO NOMINEE
		1S0066	DAVID SHAPIRO NOMINEE #2
		1S0067	DAVID SHAPIRO NOMINEE NOMINEE #3
		1S0073	SUSAN & MICHAEL SHAPIRO MEMORIAL FOUNDATION

Listing of Claimants Participating in the PW Litigation

<i>51 Indirect Accounts</i>		<i>81 Related Direct Accounts</i>	
BLMIS Account No.	BLMIS Account Name	BLMIS Account No.	BLMIS Account Name
IS0299	DAVID SHAPIRO NOMINEE NOMINEE #3	101936	ESTATE OF MICHAEL SHAPIRO
		1S0063	ADELE SHAPIRO
		1S0064	DAVID SHAPIRO
		1S0065	DAVID SHAPIRO NOMINEE
		1S0066	DAVID SHAPIRO NOMINEE #2
		1S0067	DAVID SHAPIRO NOMINEE NOMINEE #3
		1S0073	SUSAN & MICHAEL SHAPIRO MEMORIAL FOUNDATION
IS0301	DEBORAH SHAPIRO	101936	ESTATE OF MICHAEL SHAPIRO
		1S0062	DEBORAH SHAPIRO #2
		1S0064	DAVID SHAPIRO
		1S0065	DAVID SHAPIRO NOMINEE
		1S0068	DEBORAH SHAPIRO
		1S0073	SUSAN & MICHAEL SHAPIRO MEMORIAL FOUNDATION
IS0316	SAGE REALTY C/O LILLIAN SAGE	101904	MAURICE SAGE TRUST
		1S0004	SAGE ASSOCIATES C/O LILLIAN SAGE
IS0324	ROBERTA SCHWARTZ TRUST U/A/D 2/11/08	1A0016	GERTRUDE E ALPERN AS TRUSTEE U/A DATED 3/20/90
		1A0025	PAUL ALPERN AS TRUSTEE U/A DATED 3/20/90
		1S0049	DOROTHY S SCHWARTZ
		1S0052	ROBERTA SCHWARTZ
IS0353	LAURA ANN SMITH REVOCABLE TRUST	101959	RHODA SMITH IRREVOCABLE TRUST DATE 5/2/78 GEORGE SMITH TST
		1S0115	GEORGE SMITH REVOCABLE TRUST GEORGE SMITH TRUSTEE
		1S0116	REGINA SMITH TRUSTEE U/A/D 12/2/96
		1S0117	LAURA ANN SMITH
		1S0120	ROBERT W SMITH
		1H0022	BEN HELLER
IS0370	ROBERT B SEDGWICK AND NICHOLAS J SEDGWICK TIC		
IS0516	ALVIN E SHULMAN POUROVER TRUST ALVIN E SHULMAN AS TRUSTEE APT #722	1S0077	ALVIN E SHULMAN REVOCABLE TRUST
		1S0078	FLORENCE W SHULMAN REVOCABLE TRUST
IS0517	FLORENCE SHULMAN POUROVER TST FLORENCE W SHULMAN TRUSTEE APT	1S0077	ALVIN E SHULMAN REVOCABLE TRUST
		1S0078	FLORENCE W SHULMAN REVOCABLE TRUST
IS0547	SAGE ASSOCIATES C/O LILLIAN SAGE	101904	MAURICE SAGE TRUST
		1S0004	SAGE ASSOCIATES C/O LILLIAN SAGE
1T0004	DORON TAVLIN TRUST DORON A TAVLIN AND HARVEY KRAUSS ESQ TRUSTEES	102611	REBECCA ZAID C/O TAVLIN
		1T0005	AHUUA ZAID I/T/F DORAN TAVLIN &/OR RYAN TAVLIN PO B 2123
1T0036	RYAN TAVLIN TRUST UA 10/31/96 DORON A TAVLIN AND HARVEY KRAUSS ESQ TRUSTEES	102611	REBECCA ZAID C/O TAVLIN
		1T0005	AHUUA ZAID I/T/F DORAN TAVLIN &/OR RYAN TAVLIN PO B 2123
1U0017	GUNTHER UNFLAT & MARGARET UNFLAT J/T WROS	1U0004	GUNTHER UNFLAT & MARGARET UNFLAT J/T WROS

Exhibit C
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Requests to Depose Bernard L. Madoff
Fact Discovery Closed as of July 7, 2016

No.	Adv. Pro. No.	Defendants	Counsel	Fact Discovery Completion Deadline
1	10-04486	The Norma Shapiro Revocable Declaration of Trust Under Agreement Dated 9/16/08, et al.	Dentons US LLP	March 5, 2015
2	10-04702	S&L Partnership, a New York partnership, et al.	Dentons US LLP	October 9, 2015
3	10-04878	Lisa Beth Nissenbaum Trust, et al.	Chaitman LLP	October 19, 2012
4	10-04882	Laura E. Guggenheimer Cole	Dentons US LLP	March 26, 2015
5	10-04946	Stephen R. Goldenberg	Milberg LLP/Seeger Weiss LLP	June 21, 2016
6	10-04951	Harold A. Thau	Milberg LLP/Seeger Weiss LLP	June 24, 2016
7	10-05069	Potamkin Family Foundation Inc.	Milberg LLP/Seeger Weiss LLP	July 5, 2016
8	10-05130	Barbara Kotlikoff Harman	Chaitman LLP	April 30, 2015